

Docket TMD-94-00-2

Eileen S. Stommes, Deputy Administrator

USDA-AMS-TM-NOP

Room 4007 South

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Dear Ms. Stommes:

As a concerned consumer, I am deeply troubled by the USDA's proposed National Organic Rule, released for public comment on December 16, 1997. The rule seriously weakens organic standards and undermines the meaning of the term "organic", contrary to the intention of the Organic Food Production Act of 1990. Therefore, the USDA should withdraw the rule, rewrite it following the recommendations of the National Organic Standards Board (NOSB), and resubmit it for public comment. My objections to the proposed rule include:

- **Problem:** USDA's standards are weaker than existing organic certification programs and bar private certifiers from setting higher standards [Sections 205.20-205.28].

The USDA's rule should conform to the recommendations of the National Organic Standards Board (NOSB). Under the Organic Foods Production Act of 1990, the USDA-appointed NOSB has the authority to control how and by whom organic food will be grown and certified. The NOSB includes organic, environmental and consumer representatives and has expertise, credibility and legal authority to make these important and often controversial decisions.

- **Problem:** The USDA rule allows broad classes of unwanted materials and technologies in organic production [Sections 205.2, 205.7-205.9, 205.22, 205.26, 205.17].

Categories of incompatible substances and processes which are prohibited by the NOSB were allowed by USDA. The rule should prohibit the use of sewage sludge ("biosolids"), food irradiation ("ionizing radiation"), and genetically engineered organisms (GEOs). These processes are unacceptable and their use would place U.S. standards in conflict with existing industry practice, consumer expectations, and international trade and standards.

- **Problem:** The USDA creates very weak standards for organic livestock care [Sections 205.13-205.15, 205.22, 205.24].

In accordance with NOSB recommendations, the rule should require that animals have access to the outdoors, prohibit the refeeding of animal parts and manure, severely limit the use of antibiotics, and require organic feed. USDA allows 20% non-organic feed, intensive and perpetual confinement operations, feeding animal parts and manure, and liberal drug use.

- **Problem:** The USDA's flat fee structure would price small organic farms and smaller certifiers out of business [Sections 205.241-205.424].

Small-scale certifiers, farmers, and processors should not pay a disproportionate share of fees. A sliding fee system would reduce the impact on small operators.

- **Problem:** The USDA rule prohibits "green" labels in the name of protecting consumers [Sections 205.103].

USDA should leave other "green" labeling alone. Labeling such as pesticide-free, no antibiotics or hormones, ecologically produced, humanely raised, and IPM grown are outside the scope of the 1990 Organic Foods Production Act.

Signed _____

Date _____

Name _____

Address _____